

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, <i>et al.</i> , ¹	§	Jointly Administered
	§	
Debtors.	§	Case No.: 15-31858-hdh-11

**NOTICE OF (A) REVISED BID AND OBJECTION DEADLINES, (B) REVISED
AUCTION DATE AND (C) ADJOURNMENT AND RESETTING OF SALE HEARING**

PLEASE TAKE NOTICE THAT:

1. On June 15, 2015, the Court entered the Order (A) Authorizing and Approving Bid Procedures to Be Employed in Connection with the Sale of Certain Assets of the Debtors; (B) Approving Certain Bid Protections; (C) Scheduling an Auction and Sale Hearing; (D) Authorizing and Approving Assignment Procedures to Be Employed in Connection with the Identification and Assumption of Certain Pre-Petition Contracts; and (E) Approving the Manner and Form of Notice of the Auction, Sale Hearing, and Assignment Procedures [Docket No. 281] (the "Order").²

2. Pursuant to the Order, the following dates and times were set in connection with the bid, auction and sale process for certain of the Debtors' assets:

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

² Capitalized terms not otherwise defined herein have the meanings given them in the Order.

- a. Deadline for Objection to Entry of Sale Order: July 20, 2015
- b. Cure/Assignment Objection Deadline: July 24, 2015
- c. Bid Deadline: July 27, 2015 at 12:00 p.m. Central time
- d. Auction: July 29, 2015 at 10:00 a.m. Central time
- e. Sale Hearing: August 3, 2015 at 9:00 a.m. Central time

3. Also pursuant to the Order, the Debtors reserved the right to adjourn the Sale Hearing with the consent of the DIP Agent, the DIP Lenders, the Pre-Petition Agent and the Pre-Petition Lenders. Upon consultation with these parties and the Official Committee of Unsecured Creditors, the Debtors hereby adjourn the Sale Hearing and set the following dates in connection with the bidding and sale process:

- a. Bid Deadline: August 10, 2015 at 12:00 p.m. Central time**
- b. Auction: August 13, 2015 at 10:00 a.m. Central time**
- c. Deadline for Objection to Entry of Sale Order: August 18, 2015 at 4:00 p.m. Central time**
- d. Cure/Assignment Objection Deadline: August 18, 2015 at 4:00 p.m. Central time**
- e. Sale Hearing: August 25, 2015 at 1:30 p.m. Central time**

4. The Sale Hearing will be held before the Honorable Judge Harlin D. Hale, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242-1496 on **August 25, 2015 at 1:30 p.m. Central time.**

5. Except for the changes to the dates and times for the above events, the procedures governing (a) objections to entry of the Sale Order; (b) bidding, (c) the conduct of the auction and (d) Cure/Assignment Objections will otherwise remain in effect pursuant to the Order. For the avoidance of doubt, any party in interest that has filed an objection to entry of the

Sale Order or a Cure/Assignment Objection may supplement or amend such objection prior to the applicable objection deadline.

6. The Debtors will serve this notice on the most current Service List as directed by the Court's order granting complex chapter 11 case treatment and its related case management procedures [Docket No. 61].

Dated: July 27, 2015
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

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